UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Mr. Daniel Tisoncik
Management Director of Environmental Affairs - Liability
United Airlines, Inc.
233 S. Wacker Drive – 28th Floor
Chicago, Illinois 60606

**Re: USEPA Conditional Approval of the Utility Port Closure Request, Building 10, United Airlines San Francisco Maintenance Center, San Francisco International Airport**

Dear Mr. Tisoncik:

Thank you for your submission of the *Utility Port Closure Request,* dated May 13, 2014 (Utility Port Closure Request), prepared by Environmental Resources Management (ERM) on behalf of United Airlines, Inc. (UA). The Utility Port Closure Request proposes closure of the utility ports in Building 10 at the UA San Francisco Maintenance Center at the San Francisco International Airport (Site). The subject request was prepared in response to *U.S. Environmental Protection Agency (USEPA)'s Phase I Approval of the Cleanup Completion Report, Buildings 10 and 15, United Airlines San Francisco Maintenance Center, San Francisco International Airport*, dated February 25, 2014 (Phase I Approval Letter). USEPA has reviewed the Utility Port Closure Request and concurs with and hereby approves the proposed activities specified in this submittal with the following condition:

- Given that PCBs detected within the utility ports will not be removed, but rather will be sealed in place, USEPA requires that a land use control be implemented to manage PCB contamination that will remain at the Site. Such land use control can be incorporated at the completion of all phases of investigation and remediation at the Site.

USEPA is issuing this Conditional Approval under the Toxic Substance Control Act (TSCA) pursuant to 40 C.F.R. § 761, and requiring UA to implement the utility port closure as proposed.

UA has agreed to conduct PCB characterization and remediation at the Site using a phased approach. The initial phase of the investigation and remediation took place in Buildings 10 and 15 at the Site. As part of this initial phase, samples were collected in and around 18 utility ports in Building 10 for PCB analysis. Analytical results indicated that PCBs were detected at concentrations that ranged from 4.4 to 35 $\mu g/100cm^2$. The *Utility Port Closure Request* indicates that the utility ports will be closed by method of pressure grout, and will be filled to match existing grade. The phased assessment and remedial approach is an ongoing process at the Site.

This Conditional Approval does not relieve the property owner or UA from complying with all applicable federal, state, and local regulations and permits, nor does it exempt or waive any requirement to obtain additional cleanup orders, approvals or permits pursuant to other regulatory programs, where warranted. UA is also under a continuing obligation to comply with all requirements of TSCA regardless of whether or not such requirements are contained within this Conditional Approval. Nothing in this Conditional Approval limits USEPA's ability to seek penalties or pursue other legal action,

including compliance orders or criminal proceedings, for violations of this Conditional Approval or of applicable federal, state or local law (including other TSCA PCB requirements).

Finally, USEPA reserves its right to require additional characterization and/or remediation work of PCBs by UA or other potentially responsible parties, as warranted and allowed by law.

We look forward to assisting you during implementation of the Utility Port Closure Request. If you have any questions, please contact Cynthia Ruelas at (415) 972-3329. Thank you for your cooperation.

Sincerely,

Jeff Scott, Director
Land Division

Electronic cc: Derrick Whitworth, San Francisco Bay Regional Water Quality Control Board (SFB RWQCB)
Randy Lee, SFB RWQCB
Gladston Taylor, UA
Terri Herson, ERM